

I am opposed to this proposal as it limits the nature of the amateur radio service to pre-existing protocols of limited or little use in emergency communications for use in a disaster or incident of national significance. While newer innovation may occur that can be used in this proposals context, none of the existing modes have been used widely or effective in communicating in a disaster context in the past decade, in my active experience as a Red Cross communications responder.

FCC RM-11392 petition urges re-examination of USA's HF "300 baud limit" on data, and it is the perfect time for FCC to eliminate this antiquated obsolete rule. This would allow emergency communication from the USA to inter operate with other country's who have already seen the limits the old 300 baud rule creates and eliminated that obstinately stubborn anachronism. Amateur radio is still developing new and more advanced methods of using spectrum effectively. This rule would negate the existing innovation, force older less reliable and more logistically challenging methods of communication, (which declined as a direct result of cost, time and operator skill levels needed for marginal communication effectiveness) with a direct impact on emergency communication roles filled by the amateur radio service license holder.

The American Red Cross Bay Area (a 10 county chapter) decommissioned the RTTY narrow band system, over a decade ago (as defined in this proposal) as;

- 1.) To limited in communication ability
- 2.) Requiring too high a level of operator proficiency for reliable operation
- 3.) Requiring too many maintainers and costs associated with that for disaster use.

Finally I would point out that none of the older protocols have been kept current with new technology's and communications equipment.

Unlike the newer protocols now in use, the older RTTY and narrow band software, equipment and such are essentially currently limited to radio to radio, single point keyboard to keyboard transmissions with very limited store and forward capability's.

A key point here is that no current store and forward RTTY software runs on 64 Bit Operating systems, and the older programs (in most cases) require obsolete computer platforms running on (older) non-supported operating systems. If the proposal was to have much valid in discussing a way forward for a disaster communications role, one would think that the protocols proposed would have been kept current with existing technology. I find it quite telling that the petitioners preferred modes have decayed and become marginalized in amateur communications, while the newer modes (which allow mobile phone and computer SMS, Store and forward, internet interconnects, Tcp/Ip and a host of newer benefits) are booming. If anything this trend would see one argue for more automatically controlled data sub bands and to widen them.

To summarize;

I oppose FCC RM-11392 petition, with one exception as follows. FCC RM-11392 petition urges re-examination of USA's HF "300 baud limit" on data, it is the perfect time for FCC to eliminate this obsolete rule.

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